

**EXHIBIT B**

**Proposed Order**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK  
SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Presentment Date: October 10, 2017  
Time: 12:00 p.m.

Objections Due: October 10, 2017  
Time 11:00 a.m.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

**[PROPOSED] ORDER GRANTING THE TRUSTEE’S APPLICATION TO  
RETAIN ROBBINS, RUSSELL, ENGLERT, ORSECK, UNTEREINER & SAUBER LLP  
AS SPECIAL COUNSEL *NUNC PRO TUNC* TO SEPTEMBER 22, 2017**

Upon the Application of Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC, and the estate of Bernard L. Madoff, for authority to retain Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP (“Robbins Russell”) as special counsel as of September 22, 2017, and upon the declaration of Mr. Roy T. Englert, Jr. submitted in connection therewith; and due and proper notice having been given under the circumstances of this case, and after due deliberation,

**IT IS HEREBY ORDERED THAT:**

1. The Application is **GRANTED**.
2. The Court finds that Robbins Russell is deemed disinterested under 15 U.S.C. § 78eee(b)(6)(B).

3. The Trustee is authorized to retain Robbins Russell as special counsel to the Trustee as provided in the Application, *nunc pro tunc*, to September 22, 2017.

Dated: \_\_\_\_\_, 2017  
New York, New York

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HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE